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Attorneys for Defendant

Cox Communications, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARY JANE BALMES

Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS,
INC.; CAPITAL ONE SERVICES, LLC;
NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.; AT&T
MOBILITY LLC; COX COMMUNICATIONS,
INC.; and EQUIFAX INFORMATION
SERVICES LLC,

Defendants.

Case No. 2:21-cv-01759-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR COX
COMMUNICATIONS, INC. TO
RESPOND TO PLAINTIFF'S
COMPLAINT FOR DAMAGES
PURSUANT TO THE FAIR CREDIT
REPORTING ACT, 15 U.S.C. § 1681 ET
SEQ.**

(FIRST REQUEST)

Defendant Cox Communications, Inc. ("Cox"), by and through its attorneys, Dickinson Wright PLLC, and Plaintiff Mary Jane Balmes ("Plaintiff"), by and through her attorneys, Kind Law and Freedom Law Firm, stipulate and agree as follows:

1. Plaintiff filed her Complaint for Damages Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. (First Request), on September 23, 2021 (the "Complaint").

2. Plaintiff served Cox on October 4, 2021.

3. Cox's deadline to respond, move or otherwise plead to the Complaint is October 25, 2021.

4. Plaintiff and Defendant have agreed that Cox shall have up to an including November 29, 2021, to respond, move or otherwise plead to the Complaint.

5. The request for an extension is so that Cox can review its records pertaining to the allegations in the Complaint.

6. This is the first stipulation between Plaintiff and Cox to extend the time for Cox to respond, move or otherwise plead to the Complaint and it is not being entered into for purposes of any delay.

Dated: October 13th, 2021.

Dated: October 13th, 2021.

DICKINSON WRIGHT PLLC

FREEDOM LAW FIRM

/s/: Michael N. Feder

/s/: Gerardo Avalos

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Attorneys for Plaintiff Mary Jane Balmes

* * *

ORDER

IT IS SO ORDERED.

DATED: October 14, 2021


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

The undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on the 13th day of October, 2021, a copy of **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR COX COMMUNICATIONS, INC. TO RESPOND TO PLAINTIFF'S COMPLAINT FOR DAMAGES PURSUANT TO THE FAIR CREDIT REPORTING ACT, 15 U.S.C. § 1681 ET SEQ., (FIRST REQUEST)** was served electronically to all parties of interest through the Court's *CM/ECF system* as follows:

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